

ORIGINAL

U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
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# United States District Court

SOUTHERN DISTRICT OF INDIANA  
LAW OFFICES OF MCGREGOR WOODWARD, PLLC  
ATTORNEYS FOR DEFENDANT

UNITED STATES OF AMERICA

v.

TREVOR J. SHEA

## CRIMINAL COMPLAINT

CASE NUMBER: 1:10-MJ-0096

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. In or about September 2009, in Hendricks County, in the Southern District of Indiana, the defendant did employ, use, persuade, induce, entice, or coerce any minor, that being JANE DOE 1, to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and did produce those visual depictions using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce.

Counts 1 - Sexual exploitation of children

in violation of Title 18, United States Code, Section 2251(a). I further state that I am a Special Agent and that this complaint is based on the following facts:

See attached Affidavit

Continued on the attached sheet and made a part hereof.



Thomas E. Henderson  
Special Agent

Sworn to before me, and subscribed in my presence

March 4, 2010

Date

US Magistrate Judge

Debra McVicker Lynch  
Name and Title of Judicial Officer

at Indianapolis, Indiana

City and State



Debra McVicker Lynch  
Signature of Judicial Officer

**AFFIDAVIT**

I, Thomas E. Henderson (“Your Affiant”), being duly sworn, do hereby depose and state:

1. I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”). I am currently assigned to the Indianapolis Field office and have been so employed for approximately ten years. I am responsible for investigating the production, importation, advertising, receipt, and distribution of child pornography (as defined in 18 U.S.C. § 2256).<sup>1</sup>

2. I received training through USPIS and the U.S. Department of Justice (“USDOJ”) in the areas of child pornography and child sexual exploitation, as well as specialized instruction in conducting investigations of individuals suspected of possessing, receiving or distributing child pornography.

3. The information contained within this affidavit is based on my personal observations, training and experience, as well as information related to me by other law enforcement officers.

4. I am submitting this affidavit in support of a Criminal Complaint and Arrest Warrant charging Trevor Shea with one count of sexual exploitation of a minor in violation of 18 U.S.C. § 2251(a). Because this affidavit is being submitted for the limited purpose of securing a Criminal Complaint and Arrest Warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Trevor Shea violated or attempted to violate 18 U.S.C. §§

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<sup>1</sup> “Child Pornography means any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where – (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; . . . [or] (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.” For conduct occurring after April 30, 2003, the definition also includes “(B) such visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from that of a minor engaging in sexually explicit conduct.” 18 U.S.C. § 2256(8).

2251(a).<sup>2</sup>

**DETAILS OF INVESTIGATION**

5. The information contained within this affidavit is based on my training and experience, as well as information related to me by other law enforcement officers, including Detective Sergeant Jennifer Pyatt of the Brownsburg, Indiana Police Department. Detective Jennifer Pyatt is employed as a Law Enforcement Officer and has been a certified Law Enforcement Officer for the state of Indiana since 1997. She is currently assigned to the Investigations Division as a Detective Sergeant and has been assigned in that Division since 2006. Detective Pyatt specializes in the investigation of crimes against women and children and has done so since 2002. She is a certified instructor in the areas of crimes against women and children.

6. The instant investigation has revealed that Trevor Shea, while employing the email address cctv.cctvi20@gmail.com, the screen name "jamiejoyner230", and MySpace

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<sup>2</sup>18 U.S.C. § 2251(a) prohibits a person from employing, using, persuading, inducing, enticing, or coercing any minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed. To sustain a violation of this offense, the government must prove the following propositions: (1) the defendant employed, used, persuaded, induced, enticed, or coerced a minor to engage in sexually explicit conduct, or attempted to do so, for the purpose of producing any visual depiction of such conduct; and (2)(a) the defendant knew or had reason to know that such visual depiction would be transported in interstate or foreign commerce or mailed; or (b) the visual depiction was produced using materials that had been mailed, shipped, or transported in interstate or foreign commerce by any means, including by computer; or (c) such visual depiction was actually transported in interstate or foreign commerce or mailed.

account 485962991, and using a Comcast Communications internet service account at 30304 Summitt Court, Mechanicsville, MD, produced or attempted to produce child pornography involving a minor female in Indiana, JANE DOE 1.

**PRELIMINARY INVESTIGATION**

7. On September 23rd, 2009, Detective Jennifer Pyatt received a phone call from the mother of JANE DOE 1, who is currently a 17-year old minor female. The mother stated that JANE DOE 1 was being "stalked" via the Internet. She explained that, sometime in April or May 2009, JANE DOE 1 went to a friend's home. JANE DOE 1 and two other female minors then used a computer with an internet connection to visit a webcam site where they exposed their breasts to unknown webcam viewers. Approximately one week later, JANE DOE 1 began receiving emails from an unknown subject who threatened to post the webcam images, which he had captured of JANE DOE 1 and her friends exposing their breasts. This individual told JANE DOE 1 that if she complied with his wishes, which were more images and/or webcam videos, he would not post all of her nude photos for others to see on the Internet. According to the mother, JANE DOE 1 complied on September 18th, 2009, via a webcam. The mother explained that the unknown individual took over JANE DOE 1's MySpace account, that he is contacting JANE DOE 1's friends on MySpace, and that he is threatening to send the nude photos to these friends.

8. On September 25th, 2009, Detective Pyatt interviewed JANE DOE 1. JANE DOE 1 stated that approximately seven months ago, she and another female minor, JANE DOE 2, went to the home of female minor JANE DOE 3 to spend the night. JANE DOE 1 stated that the three of them went to the website Stickam.com and initially logged in under JANE DOE 2's account. They were chatting on the webcam with approximately ten other unknown website users. JANE DOE 1 said that they eventually logged out of JANE DOE 2's account and then

logged into her own account. During this time, the approximate ten other website users had gotten back into the webcam with them and some asked the girls to flash their breasts. The girls complied with this request.

9. Within a few weeks, an unknown individual contacted JANE DOE 2 via MySpace and requested more photos. JANE DOE 2 ignored the individual and he eventually turned to JANE DOE 1's MySpace account and began to threaten her through MySpace and AIM (American On-Line Instant Messaging). The individual told JANE DOE 1 that he possessed a photo of her from when she had exposed her bare breasts on Stickam.com, and he intended to post it online to all of her friends if she did not produce more photos and videos of herself in the nude engaging in sexual acts. The individual gave her specific instructions on how many photos he wanted, the wardrobe to wear, the body parts to show, and the sexual acts that he wanted her to photograph. In response, JANE DOE 1 took photos of herself and placed them in her account on Photobucket ([www.Photobucket.com](http://www.Photobucket.com)).

10. According to JANE DOE 1, the individual was not satisfied with the photos that she had provided of herself and he demanded that she get on the webcam with him and again perform sexual acts in the nude. JANE DOE 1 ultimately complied with his demands during the time frame of September 14th, 2009 through September 23rd, 2009. At his request and demand, while on her webcam, she digitally penetrated herself and licked her finger, and she placed her head and hand in the toilet and then licked her hand.

11. During the month of September 2009, the individual also blackmailed JANE DOE 1 to give him her password to her MySpace account. The individual told JANE DOE 1 that if she did not comply, he would post the video that she had produced while on her webcam during the time frame of September 14th, 2009 through September 23rd, 2009, on the Internet and on

her MySpace account page. JANE DOE 1 gave him her password. The individual then took control of her MySpace account and began speaking with her friends while pretending to be JANE DOE 1. While pretending to be JANE DOE 1, he convinced one of JANE DOE 1's friends to give him JANE DOE 1's cellular phone number by claiming that JANE DOE 1 had obtained a new number and had forgotten her old number. JANE DOE 1 believed that he called her on her cell phone, but she did not answer. The phone number revealed a "Private Number" had called.

12. JANE DOE 1 voluntarily provided Detective Pyatt with copies of some of the chats with this individual that she had saved. She said that he used the name "John", but he told her that this was not his real name. In one of the chats, "John" stated as follows:

show ass

closer to cam

show it slowly

pull down panties

show ass and pussy

...

keep modeling

ass

bend over ass in cam

stay in the cam the whole time

you are out of the cam

finger pussy now

face cam up so I can see face and boobs and pussy

I said face

up more

finger with one hand rub boobs with other hair out of face

cam back up

13. During the September 25, 2009 interview, and in subsequent conversations with Detective Pyatt, JANE DOE 1 said that the individual contacts her using a number of different email addresses, screen names and/or names, including the following:

- a. cctv.cctvi20@gmail.com; the name associated with the account is "James" and "John" was the name given to JANE DOE 1 by the individual.
- b. artistentity@aol.com<sup>3</sup>
- c. AIM screen name of "jamiejoyner230"<sup>4</sup>
- d. MySpace account 485962991, with the name "James" associated with it.

14. During the September 25, 2009 interview, it was discovered that JANE DOE 1 reported these events to NCMEC (the National Center for Missing and Exploited Children) through its Cyber Tipline. Law enforcement then contacted NCMEC and requested that any and all NCMEC Cyber Tips concerning this individual be forwarded.

15. In September 2009, four Cyber Tips regarding the individual were provided by NCMEC to Detective Pyatt. Two were reported by JANE DOE 1 and two were reported by MySpace.

16. One of the NCMEC Cyber Tips received from MySpace revealed that an

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<sup>3</sup>JANE DOE 1 indicated that she was not certain whether her memory of the AOL email account artistentity@aol.com was accurate.

<sup>4</sup>Jane Doe 1 provided Detective Pyatt with this AIM screen name on October 12, 2009.

individual was using Stickam.com to capture webcam footage of females in various states of nudity and was then using the webcam stills that he had recorded to blackmail the females who were involved. The NCMEC Cyber Tip reported that JANE DOE 1, who is seventeen years of age, was the victim in this report and the suspect was named "James" from "Silver Spring, Maryland 20518, US". This report also showed that based upon information provided by the individual, he is nineteen years of age and his email address is cctv.cctvi20@gmail.com. MySpace also reported that his screen/user name is 485962991 and when the individual was logged into this account on September 21, 2009 at 12:45 PM, MySpace captured his IP address, which was 68.49.10.128. The NCMEC Cyber Tip from MySpace also included chats between the victim and the individual. The dates of the chats provided in the NCMEC Cyber Tip ranged from September 17th, 2009 at approximately 9:30 PM to September 20th, 2009 at approximately 7:15 PM.

17. In an undated, captured MySpace chat provided by MySpace to NCMEC, the suspect "james (485962991)" is chatting with JANE DOE 1, and "james" stated as follows:

??????its you! remember when you got on stickam and stripped?  
well I recorded the entire stream. I also saved your entire friends  
list to my computer. even if you block me or delete me I still can  
send the video to every friend on your list as of right now. so do  
not block or delete me. respond to this message when you read it. if  
you do not respond I will send the video to all of your  
friends.??????

In a MySpace chat dated September 17th, 2009, at 9:30 PM, "james (485962991)" stated

as follows:

you ignored my message, youve been online. giving you 2 more days. thats final. no second chances. 2 days to reply or video is sent. period.

In a MySpace chat dated September 19th, 2009, at 7:36 PM, "james (485962991)" stated as follows:

[JANE DOE 1], havent gotten them, sorry, I will have to send out your video. you can block me after you read this, I will send them out.

In a MySpace chat dated September 20th, 2009, at 6:11 PM, "james (485962991)" stated as follows:

cctv.cctvi20@gmail.com is my email

I will be gone forever, I will teach you how to make sure this never happens again, I will delete the post of the video online.

I want about 7 pics, thong and bra, boobs, pussy, ass in thong, licking finger, etc.

once I get them then you can forget about me forever

18. On October 8th, 2009, law enforcement received another NCMEC Cyber Tip that was reported by MySpace to NCMEC in reference to this individual. On September 27th, 2009, NCMEC received a Cyber Tip from MySpace showing that it had captured (5) images that had been uploaded from IP address 68.49.10.128 on September 27th, 2009 ranging from 6:16:28 PM to 7:32:03 PM. The (5) images were sent to law enforcement with this Cyber Tip. The first

image depicts a female from the waist area to her knees; the female is pulling her panties down to reveal her nude, genital area. The second image is of a nude female and Detective Pyatt was able to identify the female as JANE DOE 1; JANE DOE 1's face is partially covered with her left hand, and her right hand is extended with her middle finger raised to the camera. The third and fourth images depict a female's bare breasts. The fifth image depicts the bare breasts of three females and is labeled by unknown persons with three names. The five images were shown to JANE DOE 1. She identified herself in all five images and in the fifth image, she also identified her two friends. JANE DOE 1 confirmed that she uploaded the first four images to Photobucket for the individual to view them.

19. JANE DOE 1 was in the Southern District of Indiana during all of her communications with the individual and on each occasion that she complied with the individual's demands that she photograph or film herself.

**IDENTIFICATION OF 30304 SUMMITT COURT, MECHANICSVILLE, MD 20659**

20. A "WHOIS" search of the IP address 68.49.10.128 revealed that Comcast Communication LLC owned the rights to that IP address. On October 2nd, 2009, a subpoena was issued to Comcast Communications LLC for the account information, IP connection log data, any email accounts and screen names assigned to the IP address 68.49.10.128 from September 17th, 2009 to September 21st, 2009.

21. On October 2nd, 2009, a subpoena was issued to Google Inc., requesting subscriber and account information, log on/off times, IP addresses used, IP connection log data and any email accounts and screen names assigned to cctv.cctvi20@gmail.com.

22. On October 2nd, 2009, a subpoena was issued to America Online for subscriber and account information, IP addresses used, IP log on/off times, IP connection log data and any

email accounts and screen names assigned to artistentity@aol.com and AIM screen name "jamiejoyner230."

23. On October 13th, 2009, the results from the subpoena to Comcast Communications LLC were received and provided the following information regarding the individual who was assigned the IP address 68.49.10.128 from September 17th, 2009 to September 21st, 2009: the subscriber name is Michael Shea, the service address is 30304 Summitt Ct., Mechanicsville, MD 20659, the telephone number is 301-884-7482, the type of service is residential high speed internet services, the IP address is dynamically assigned, the account number is 0565312757701, the email user IDs are shea30304, tjshea, mjshea, tdshea and mjshea2 (i.e., all Comcast user IDs end in @comcast.net), and the account was active.

24. On October 14th, 2009, the results from the subpoena to Google were received and provided the following information: the email address cctv.cctvi20@gmail.com was enabled (as of the date of the return), the email address cctv.cctvi20@gmail.com has services with YOUTUBE, Gmail, Talk, Toolbar and Transliteration, the account name is John Starlet, the account creation date is 7-02-09 at 6:34 PM GMT, and the IP address from which the account was created on 7-02-09 at 6:34 PM GMT was 68.49.10.128. The subpoena return also revealed that the individual using the email address cctv.cctvi20@gmail.com was logging into this Gmail account from the IP address of 68.49.10.128 on days during the period of September 17th, 2009 through September 21st, 2009, which is when the IP address was assigned by Comcast to 30304 Summitt Court, Mechanicsville, MD 20659. In addition, this individual logged into this Gmail account from IP address 68.49.10.128 on several other days during the period between September 4th, 2009 and October 2nd, 2009.

25. On October 20th, 2009, the results from the subpoena to American Online (AOL)

were received and provided the following information: the screen name "jamiejoyner230" is an active account (as of the date of the return), the screen name has been active since 9-27-2009, and the associated email address is jamiejoyner230@aol.com. The last session for this account was 10-12-2009 at 03:44:05 and the service is in the United States. AOL also provided information that the individual using the screen name jamiejoyner230 had logged into this account from IP address 68.49.10.128 on the following dates: September 28, 2009, September 30, 2009, October 1, 2009, and October 2, 2009.

26. In its return, AOL also provided the following information: the email account artistentity@aol.com is active, the account is registered to Roti Laureano of 205 Cypress Lane, Snohomish, Washington, 98290, and Laureano has been a member since June 22nd, 1994. This information appears to confirm that JANE DOE 1 inaccurately recalled the AOL email account used by the individual.

27. On February 22, 2010, a query of Accurint, a database of public records, indicated that the following individuals reside at 30304 Summitt Ct., Mechanicsville, MD 20659 and have a phone number of 301-884-7482: Theresa Dale Shea Sr., Michael Shea, Brian A. Shea, Chad M. Easter, and Trevor Shea. A search of an online telephone database, specifically anywho.com, revealed that the telephone number 301-884-7482 is registered to Michael Shea and associated with 30304 Summitt Court, Mechanicsville, MD 20659.

28. On or about February 24, 2010, an interview with a U.S. Postal Service letter carrier from the Mechanicsville Carrier Annex, revealed that individuals with the last names Shea and Easter both receive mail at 30304 Summitt Court, Mechanicsville, MD 20659.

29. On or about February 24, 2010, during surveillance of 30304 Summitt Court, Mechanicsville, MD 20659, by law enforcement officers in Maryland, an individual matching the

description of Michael Shea based on his driver's license photo was seen exiting the home with a black dog.

30. On March 1, 2010, a query of a Maryland Real Property Search database revealed that Michael and Theresa Shea are listed as owners for the address 30304 Summitt Court, Mechanicsville, MD 20659.

#### **EXECUTION OF SEARCH WARRANT**

31. On March 4, 2010, a federal search warrant was executed at 30304 Summitt Court, Mechanicsville, MD 20659. Trevor Shea ("Shea"), who was present in the home, was advised of and waived his *Miranda* rights. Shea admitted to living in the basement at 30304 Summitt Court, Mechanicsville, MD 20659.

32. Shea admitted to regularly visiting the website Stickam.com for a long period of time and persuading teenage girls on the website to show their breasts. Shea stated that he then would visit the website "anonib.com" and wait until the webcam footage of the girls showing their breasts was posted on this website. Shea said that he would obtain contact information for the girls depicted in the posted webcam footage, contact the girls, send them a hyperlink to the posted video on "anonib.com", tell them to produce additional images or videos for him, and if they did not comply, he would threaten to post the videos in other places where their friends could view them.

33. Shea admitted to engaging in this behavior for his sexual satisfaction. He stated that he has done this to ten (10) or more girls, who were 17 or 18 years old. He said that images or videos of three or four girls who complied with his demands would be found saved on his desktop computer, including images or videos of JANE DOE 1. When shown copies of the above-referenced chats between the individual and JANE DOE 1, Shea signed the copies and

admitted that he was the individual chatting with JANE DOE 1 in the chats. When shown copies of the images of JANE DOE 1 described in paragraph 18, which were provided to NCMEC by MySpace, Shea signed the copies and admitted that she produced these images at his demand.

34. Law enforcement conducted an initial, on-scene forensic examination of Shea's desktop computer, which was found in Shea's bedroom in the basement. Shea stated that he built this computer himself. Although his father occasionally uses the computer, Shea admitted that he is the primary user of the computer.

35. On the desktop computer, law enforcement found images and videos of prepubescent minors engaging in sexually explicit conduct and a video of the Stickam.com webcam footage of JANE DOE 1, JANE DOE 2, and JANE DOE 3 showing their breasts. In addition, in a subfolder named after the first name of JANE DOE 1, law enforcement found at least three of the images referenced in paragraph 18, including the image of JANE DOE 1 pulling her panties down to reveal her nude, genital area, the nude image of JANE DOE 1 where her face is partially covered with her left hand, and an image of JANE DOE 1's breasts. In this same subfolder, law enforcement also found videos of JANE DOE 1 nude engaging in sexually explicit conduct as well as a video of JANE DOE 1 placing her head in the toilet.

**CONCLUSION**

36. Based on the foregoing facts, to the best of my knowledge and belief, Trevor Shea has committed or attempted to commit a violation of Title 18, United States Code, § 2251(a). Therefore, I request the Court to issue an Arrest Warrant and Criminal Complaint charging Trevor Shea with one count of this offense.



Thomas Henderson  
U.S. Postal Inspector  
U.S. Postal Inspection Service

SUBSCRIBED TO AND SWORN BEFORE ME THIS 4th DAY OF MARCH, 2010.



Debra McVicker Lynch  
United States Magistrate Judge